

Exhibit “A”

0877490
BJP/hs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DIOMINA ASTO,

Plaintiff,

-against-

INTERROGATORIES

07 Civ. 4787

THERESA R. BETTER and ROBERTO BETTER,

Defendants.
-----X

Pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure and Local Rule 33.3, defendants, THERESA R. BETTER and ROBERTO BETTER, hereby request that plaintiff serves upon the undersigned attorneys sworn answers to the interrogatories set forth below within thirty (30) days of service hereof:

1. The names and addresses of witnesses with knowledge and/or information relevant to the subject matter of this action.
2. State the manner of computation of each category of damage alleged.
3. The existence, custodian, location and general description of relevant documents and other physical evidence, or evidence of a similar nature.
4. With respect to any injuries alleged suffered by each individual plaintiff, state:
 - (a) the extent and nature of any disability, including those alleged to be permanent and those alleged to be aggravated.
 - (b) describe in detail the location of any pain suffered, and the duration and intensity of such pain.

(c) Whether or not you suffered any restraint of your normal activities due to the injuries allegedly suffered, and describe in detail the nature of such restraint, and the dates you suffered the pain.

5. Have you sustained any additional financial loss as a result of the incident complained of, other than those covered by preceding interrogatories: If so, state:

- (a) the nature and amount of such losses.
- (b) the date thereof.
- (c) the name and address of any persons to whom any money so claimed as an additional loss was paid.

Dated: White Plains, New York
June 8, 2007

LAW OFFICE OF THOMAS K. MOORE

By: 
BRIAN J. POWERS (BP-1992)

Attorneys for Defendants
THERESA R. BETTER and ROBERTO BETTER
Office & P.O. Box Address
701 Westchester Avenue - Suite 101W
White Plains, New York 10604
(914) 285-8500

TO:

KLEIN & FOLCHETTI
Attorneys for Plaintiff
219 Westchester Avenue, 6th Floor
Port Chester, New York 10573
(914) 934-8792

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK)
)
COUNTY OF WESTCHESTER)

BRIAN J. POWERS, being duly sworn, deposes and says that deponent is an attorney in the LAW OFFICE OF THOMAS K. MOORE, attorneys for one of the parties herein: is over 18 years of age; is not a party to the action. That deponent served the within

INTERROGATORIES

on June 8, 2007 upon the below named attorney(s) for the listed parties, by depositing a true copy of the same securely enclosed in a postpaid wrapper in the Letter Box maintained and exclusively controlled by the United States Postal Service at 701 Westchester Avenue, White Plains, New York 10604 directed to the said attorney(s) at the address indicated below; that being the address within the state designated by said attorney(s) for that purpose, or the place where said attorney(s) then kept an office, between which places there then was and now is a regular communication by mail as follows:

KLEIN & FOLCHETTI
Attorneys for Plaintiff
219 Westchester Avenue, 6th Floor
Port Chester, New York 10573


BRIAN J. POWERS

Sworn to before me this
8th day of June, 2007


Notary Public

HENRY R. GAULT
NOTARY PUBLIC, State of New York
No. 9100435330
Qualified in Westchester County
Expiration Expires July 28, 2010